

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

PERRY WOODS,

Plaintiff

v.

NATIONAL RAILROAD PASSENGER  
CORPORATION, dba AMTRAK;

Defendant.

NO.

COMPLAINT FOR PERSONAL  
INJURY DAMAGES

(Demand for Jury Trial)

**I. INTRODUCTION**

1. Plaintiff Perry Woods seeks damages for injuries he suffered after slipping on an oil spill at a train station owned and operated by Defendant National Railroad Passenger Corporation, dba Amtrak.

**II. PARTIES**

2. Plaintiff Perry Woods is an individual who resides in King County, Washington.

3. Defendant Amtrak is a District of Columbia corporation that operates passenger trains throughout the United States, including in the State of Washington.

**III. JURISDICTION AND VENUE**

4. This Court has original jurisdiction under 28 U.S.C. §§ 1331 and 1349. Amtrak is

1 incorporated by or under an Act of Congress.

2 5. Venue is proper in the Western District of Washington under 28 U.S.C. § 1391  
3 because the events and omissions giving rise to Plaintiff's claims occurred in this judicial district.

4 **IV. STATEMENT OF FACTS**

5 6. On May 10, 2019, Mr. Woods traveled from Seattle, WA to Vancouver, WA on  
6 Amtrak Cascades train number 505.

7 7. After disembarking train 505, Mr. Woods slipped on an oil spill on the walkway  
8 between tracks at the Amtrak station in Vancouver.

9 8. Mr. Woods suffered serious injuries when he fell to the ground, including  
10 significant injuries to his elbow. Mr. Woods still suffers the effects of those injuries.

11 **V. CAUSES OF ACTION**

12 9. Plaintiff restates the allegations of the above paragraphs.

13 10. Defendant breached its duty of care to Plaintiff by, among other things, (a) failing  
14 to conduct operations in a manner which prevents unreasonably dangerous conditions, such as oil  
15 spills, (b) failing to inspect, maintain and/or fix unreasonably dangerous conditions on its  
16 premises, and (c) failing to warn passengers about the existence of dangerous conditions.

17 11. Defendant's actions constitute negligence and/or willful and wanton recklessness.

18 12. As a direct and proximate result of Defendant's unlawful conduct, Plaintiff has been  
19 damaged in an amount to be fully established at trial. Such damages include, but are not limited to,  
20 medical treatment costs and significant physical and mental pain and suffering.

21 **VI. PRAYER FOR RELIEF**

22 Plaintiff requests the following relief:

23 1. Judgment against Defendant in an amount to be determined at trial; and

24 2. For such other relief as the Court deems just and equitable.  
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2 DATED this 3<sup>rd</sup> day of May, 2022.  
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4 LEGAL RESOLUTIONS, PLLC

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6 By           /s/ Josias Flynn            
7 Josias Flynn, WSBA No. 44130  
8 Attorney for Plaintiff  
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